

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
The Development of Operational,)	
Technical and Spectrum Requirements)	
For Meeting Federal, State, and Local)	
Public Safety Agency Communication)	WT Docket No. 96-86
Requirements Through the Year 2010)	

**E.F. JOHNSON COMMENTS IN SUPPORT OF THE MOTOROLA
PETITION FOR RECONSIDERATION
6.25 kHz MIGRATION RULING IN 700 MHz**

E.F. Johnson Company would like to file comments in support of the Motorola petition for reconsideration regarding the 6.25 kHz migration ruling given in the Fifth Report and Order for WT docket 96-86.

E.F. Johnson Company, a subsidiary of EFJ, Incorporated, is a manufacturer of Private Land Mobile equipment, with offices in Washington, D.C, Lincoln, NE, and Waseca, MN. E.F. Johnson has been a manufacturer of radio equipment for nearly 80 years, with a history of private radio equipment manufacturing for over thirty years. Currently our products cover Public Safety systems, as well as Business and Industrial products.

E.F. Johnson Company would like to support the petition by Motorola concerning the migration timetable for conversion to 6.25 kHz in the General Usage and State License channels of the 700 MHz public safety band. E.F. Johnson does support the

migration toward more spectrally efficient modulation equipment, and realizes that this efficiency is needed to meet the growing demands of public safety users. As such, E.F. Johnson has no specific concerns over the requirement for equipment certified subsequent to December 31, 2006 to have the capability of 6.25 kHz channel efficiency. E.F. Johnson also has no concerns over the December 31, 2016 date for users to cease operation on 12.5 kHz channels. E.F. Johnson, however, is concerned about the proposed method and timetable for implementing some of the other changes. Specifically of concern is the prohibition of new users to deploy 12.5 kHz channel technology after December 31, 2006, and the prohibition of manufactures to sell single mode 12.5 kHz equipment after that date.

E.F. Johnson Company has concerns over the lack of availability of field-proven narrowband technologies for 6.25 kHz or equivalent channel efficiency. To be sure, technologies do exist that can provide these spectral efficiencies. However, open standards for interoperable equipment are not in a current state of maturity that would allow for purchase and deployment of systems, other than proprietary implementations. E.F. Johnson believes that the user is best served by open standards, allowing for multi-vendor interoperable equipment. Requiring licensees of systems after December 31, 2006 to deploy only 6.25 kHz channel efficiency equipment will force them into potentially immature or non-interoperable solutions. Further, because of the possible delays in vacating the television stations currently occupying the band in the major metropolitan areas, deployment of public safety technology will be delayed. This will impair the ability of manufacturers to mature the technologies required to move toward

6.25 kHz bandwidths. E.F. Johnson believes that a relaxation in the date which new licensees are required to deploy 6.25 kHz technologies should be allowed.

The prohibition of manufacturers to sell single mode 12.5 kHz equipment subsequent to December 31, 2006 will put added burden upon users that have deployed 12.5 kHz equipment prior to that date. They will be forced to purchase multi mode subscriber equipment to support continued operation of their systems prior to the December 31, 2016 date for cessation of 12.5 kHz operation. This could potentially add cost to the equipment, because of the multi-mode requirement. For this reason we would also suggest relaxing the date which single mode 12.5 kHz equipment is allowed be offered for sale.

E.F. Johnson believes that the best interest of the user community is served by a less aggressive move toward 6.25 kHz. Allowing the users the flexibility to make technology choices that are most beneficial to them is important. Pushing them into technologies that may be less than fully proven will cause problems, and in general, will not serve the needs of public safety. We would suggest delaying the date which new licensees are required to implement 6.25 kHz channel technology until December 31, 2011. We would further suggest that the date which single mode 12.5 kHz equipment could be offered for sale be delayed until December 31, 2011.

E.F. Johnson Company would like to express its appreciation for the opportunity to comment on these matters.

April 28, 2003

Respectfully Submitted,

/S/ John S. Oblak
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